

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

EAGLE HARBOR HOLDINGS, LLC, and
MEDIUSTECH, LLC,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-cv-05503-BHS

**DECLARATION OF REBECCA IZZO
IN SUPPORT OF FORD'S REPLY IN
SUPPORT OF MOTION FOR LEAVE
TO FILE AN AMENDED
COUNTERCLAIM FOR TRADE
SECRETS MISAPPROPRIATION AND
TO JOIN DAN ALAN PRESTON AS A
COUNTERCLAIM-DEFENDANT**

I, Rebecca Izzo, declare as follows:

1. I am an associate at the law firm Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, Massachusetts, 02109. I am one of the attorneys responsible for the representation of Defendant Ford Motor Company ("Ford") in the above-captioned matter.
2. Attached to this declaration as **Exhibit 1** is a true and correct copy of an e-mail from Floyd Short, counsel for Plaintiffs, to counsel for Ford, dated November 11, 2013.
3. Attached to this declaration as **Exhibit 2** is a true and correct copy of Plaintiffs' Notice of Subpoena to David Patterson, dated March 6, 2014.

1 4. Attached to this declaration as ***Exhibit 3*** is a true and correct copy of an excerpt from
2 Plaintiffs' Third Supplemental Objections and Responses to Ford Motor Company's Third Set
3 of Interrogatories, dated May 5, 2014.

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5 I declare under penalty of perjury under the laws of the United States of America that
6 the foregoing is true and correct.

7 Executed this 20th day of June, 2014.

8
9 /s/ Rebecca Izzo
10 Rebecca Izzo
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was filed electronically with the Court and thus served simultaneously upon all counsel of record, this 20th day of June, 2014.

/s/ Duncan E. Manville

Duncan E. Manville